

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

Donna Duke-Koelfgen, §  
§  
Plaintiff, §  
§  
v. § Case No.: 5:22-cv-01010-JKP-ESC  
§  
Alamo Community College District §  
(AKA Alamo Colleges District), §  
Defendant. §

**DEFENDANT'S ADVISORY TO COURT**

Defendant Alamo Community College District writes to the Court due to the imminent dispositive motions and *Daubert* motion deadlines under the current Scheduling Order (Doc. 11), both set for Friday, September 15, 2023, as well as the discovery deadline that passed on August 18, 2023. The parties have been unable to complete discovery. On July 24, 2023, in advance of these deadlines, the parties filed their agreed Proposed First Amended Scheduling Order (Doc. 16). Given the deadlines in question and that the Proposed First Amended Scheduling Order is the first extension sought by the parties, Defendant respectfully requests consideration and ruling of the proposed First Amended Scheduling Order.

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

/s/ Mario A. Barrera  
Mario A. Barrera  
State Bar No. 01805915  
mario.barrera@nortonrosefulbright.com  
111 W. Houston Street, Suite 1800  
San Antonio, TX 78205  
Telephone: (210) 224-5575  
Facsimile: (210) 270-7205

Counsel for Defendant  
Alamo Community College District

**CERTIFICATE OF SERVICE**

I hereby certify that on this, the 14th day of September, 2023, I electronically filed the foregoing instrument with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Morteza Benjamin Karimi  
3559 Lake Austin Blvd., Apt. E  
Austin, Texas 78703  
[benjamin.karimi@attorneykarimi.com](mailto:benjamin.karimi@attorneykarimi.com)

*/s/ Mario A. Barrera*

---

Mario A. Barrera